

Message

From: Kaur, Supinderjit [Kaur.Supinderjit@epa.gov]
Sent: 6/28/2018 6:50:55 PM
To: Griffiths, Rachel [griffiths.rachel@epa.gov]; Vaughn, Stephanie [Vaughn.Stephanie@epa.gov]; Donovan, Betsy [Donovan.Betsy@epa.gov]; Sivak, Michael [Sivak.Michael@epa.gov]; Fajardo, Juan [Fajardo.Juan@epa.gov]; Clemetson, Michael [Clemetson.Michael@epa.gov]
Subject: RE: RKL FS Comments
Attachments: EPA Comments to May 2018 RKL Revised FS.PDF

Thank you Stephanie and Rachel. Attached are the revised FS comments per the suggestions below. Please let me know what you think.

Supinder

From: Griffiths, Rachel
Sent: Thursday, June 28, 2018 1:54 PM
To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Clemetson, Michael <Clemetson.Michael@epa.gov>
Subject: RE: RKL FS Comments

Modified the language slightly on #29 and 30 (attached).

I think it is OK to leave the reference to an impermeable cap since that is what will need to be used to prevent infiltration/migration (and it's in the FS already). The size of the impermeable areas is expected to be limited, and won't have much of an effect on sitewide hydrology.

-Rachel

From: Vaughn, Stephanie
Sent: Wednesday, June 27, 2018 3:34 PM
To: Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Griffiths, Rachel <griffiths.rachel@epa.gov>; Clemetson, Michael <Clemetson.Michael@epa.gov>
Subject: RE: RKL FS Comments

Thanks, Supinder. I do have some comments/questions:

For comment 1, did Juan ever provide input? I know he's on vacation this week. If not, I think it's okay, but could you look at the RAOs – I think the word "eliminate" in the last sentence should be changed to "prevent" or "reduce" or "minimize", consistent with the RAOs. - Changed "eliminate" to "minimize"

Comment 11b says, "Please remove the text that indicates that Britten Road and Green Village Road are not designed to accommodate high volumes of heavy construction equipment. Road repairs for remedial construction is a common practice and included in cost estimates. Please discuss potential impacts to the community along Britten Road and Green Village Road." I don't necessarily disagree with this comment, but wonder where it came from. I'm not sure it's worth passing along...thoughts? - Deleted this comment

Comment 12 – typo, oil should be "soil." - Changed

Comment 30 mentions an impermeable cap. I wonder if we want to reconsider this, given the communities concerns about increased flooding. Perhaps we don't want to be so prescriptive in the ROD that the cap needs to be impermeable. I'm not sure...maybe we should discuss this? I don't want to hold up sending comments, though. – This comment is referring to the TP-09 area, which is an APC and also the area to be remediated for groundwater source control. Rachel revised language of comment.

Comment 36 – for the part in red, we could offer to show them an example if they ask for clarification. - Okay

Also, given our recent discussions about the BERA and Appendix C, I wonder if they need to change their analysis of Alternative 2 throughout the FS. It clearly is not protective of human health and the environment. I hate to bring this up now, but it seems correct, right? – they mention in the text that alternative 2 is not protective for ecological receptors.

Thanks!!

From: Kaur, Supinderjit

Sent: Wednesday, June 27, 2018 10:43 AM

To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Griffiths, Rachel <griffiths.rachel@epa.gov>; Clemetson, Michael <Clemetson.Michael@epa.gov>

Subject: RE: RKL FS Comments

Are these FS comments good to send out to Geosyntec?

Thank you

Supinder

From: Kaur, Supinderjit

Sent: Wednesday, June 20, 2018 5:37 PM

To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Griffiths, Rachel <griffiths.rachel@epa.gov>; Clemetson, Michael <Clemetson.Michael@epa.gov>

Subject: RKL FS Comments

Hi everyone,

Attached are the comments for Rolling Knolls revised FS (excluding comments on Appendix B & C). Please take a look and let me know if you would like any changes.

Juan – for general comment 1 “The ARSs were developed as site-specific PRGs and would replace the applicable chemical-specific ARARs. For the evaluation of chemical specific ARARs for Alternatives 3, 4, and 5, provide a detailed discussion on how the PRGs would be met and how capping/excavating 25 acres, remediation of APCs, and vegetative covers would eliminate exposure pathways.” Is the language okay?

Michael S – Is the proposed language for specific comment 10 accurate? “The text says that dioxin-like PCBs were determined to be the primary risk driver at the Site. Please change this to “dioxin-like PCBs were determined to be the primary risk driver at the Site, and the only risk drivers for human health for the trespasser scenario.”

Stephanie – Is the wording for comment 36 (below) sufficient? It's the one on the tables comparing soil and groundwater alternatives.

In tables 6-1 (comparative analysis of soil remedial alternatives) and 7-1 (comparative analysis of groundwater remedial alternatives), all evaluation criteria are evaluated and compared with the same numerical ranking of poor, moderate, good, and excellent. Threshold criteria and balancing criteria should not have the same categorization or comparison. Please make the following changes to the tables:

- For threshold criteria, change the grading to either “meets NCP criterion” or “does not meet NCP criterion”. The alternatives either comply with protection of human health and environment and compliance with ARARs or do not meet them. These criteria should not be described as poor, excellent, or somewhere in-between.
- Instead of using the numerical ranking mentioned above, for all balancing criteria except cost, change grading to the following (including the descriptions in the notes):
 - o Poor – alternative is expected to perform poorly against criterion
 - o Moderate - alternative is expected to perform moderately well against criterion
 - o High – alternative is expected to perform very well against criterion
- For cost balancing criteria, remove any grading or classification. Only keep the dollar amount value/total cost in these tables.
- Include a row for each alternative that states the approximate time it would take to achieve the RAOs (This would be useful, not sure if it is necessary, thoughts?)

In addition to the comparative analysis tables for the soil and groundwater alternatives, please include detailed tables in the FS that describe and summarize how the respective alternatives rank against evaluation criteria from Section 6 and 7. (Is this descriptive enough of what they would need to do? Or should the comment be more precise, also a more detailed table would be more useful, however would it be asking them to do extra work?)

Thank you!!

Supinder

Supinderjit Kaur

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